

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 19-03134-01-CR-S-BP
)	
LAURA A. OGLESBY,)	
)	
Defendant.)	

UNOPPOSED MOTION
FOR CONTINUANCE OF TRIAL SETTING

Comes now Defendant, Laura A. Oglesby, by counsel, and hereby moves that this case be continued from its current trial setting on the Joint Criminal Jury Trial Docket commencing May 3, 2021, and reset to the Joint Criminal Jury Trial Docket commencing December 6, 2021. In support of this motion, the Defendant states:

1. An eight count Indictment was filed against Ms. Oglesby on January 21, 2021.
2. This is the first Motion for Continuance.
3. Due to the press of other cases, additional time is needed to obtain and review the discovery, conduct legal research, conduct investigation, meet with the Defendant, and prepare for trial or negotiate a plea.
4. This continuance is not sought for the purpose of undue delay, but is sought in truth and fact that Ms. Oglesby may be afforded due process of law under the Fifth Amendment to the United States Constitution and afforded effective assistance of counsel under the Sixth Amendment to the United States Constitution. In accordance with 18

U.S.C. §§ 3161(h)(7)(A) and (B)(I) and (IV), it is submitted that the above-stated reasons for a continuance outweigh the best interests of the public and Ms. Oglesby to a speedy trial which is required by 18 U.S.C. § 3161(c)(1). In short, the procedural components that currently exist in this case necessitate a continuance to avoid a miscarriage of justice and to make certain that Ms. Oglesby has clear, meaningful, and effective access to counsel while preparing to resolve this case.

5. Under the provisions of 18 U.S.C. § 3161(h)(7)(A), the period of time until the next criminal trial docket should be excluded in computing the period of time in which a defendant should be brought to trial under the provisions of the Speedy Trial Act.

6. Undersigned counsel has conferred with Assistant United States Attorney Shannon T. Kempf, who stated that given the basis for the request, he does not oppose the requested continuance.

WHEREFORE, Defendant, Laura A. Oglesby, hereby moves that this case be continued from its current trial setting on the Joint Criminal Jury Trial Docket commencing May 3, 2021, and reset to the Joint Criminal Jury Trial Docket commencing December 6, 2021.

Respectfully submitted,

/s/ Michelle Nahon Moulder

MICHELLE NAHON MOULDER, #40516

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Attorney for Defendant

April 1, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April, 2021, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system, which sent e-mail notification of such filing to all CM/ECF participants in this case and a copy was mailed, via the United States Postal Service, to all non-CM/ECF participants.

/s/ Michelle Nahon Moulder

MICHELLE NAHON MOULDER